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[Proposed] Special Litigation Counsel to
 Kavita Gupta, Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

DESERT OASIS APARTMENTS, LLC,

Debtor.

Case No.: bk-s-18-12456-gs

Chapter 11

Hearing Date: December 10, 2020

Time: 10:00 a.m.

**SUPPLEMENTAL DECLARATION OF JOHN D. FIERO IN SUPPORT OF
 APPLICATION OF THE CHAPTER 11 TRUSTEE FOR ORDER APPROVING
 EMPLOYMENT OF PACHULSKI STANG ZIEHL & JONES LLP AS SPECIAL
LITIGATION COUNSEL**

I, John D. Fiero, declare as follows:

1. I am a partner of Pachulski Stang Ziehl & Jones LLP (“**PSZJ**” or the “**Firm**”). I am an attorney-at-law, duly admitted and in good standing to practice in the State of California, as well as the United States District Court for the Northern District of California. I submit this Supplemental Declaration in connection with the Application of Kavita Gupta, chapter 11 trustee (the “**Trustee**”)¹ of the Debtor, to retain PSZJ as special litigation counsel to the Trustee and to provide the disclosures required under the Bankruptcy Code.

¹ Capitalized terms not defined herein have the meanings set forth in the original Application.

2. In response to concerns expressed by the Office of the United States Trustee, PSZJ has made the following additional investigation of potential adverse interests in this case and a related case, that of Desert Land, LLC (“Desert Land”). Specifically, PSZJ has undertaken a full and thorough review of its computer database which contains the names of clients and other parties interested in particular matters. PSZJ requires all of its professionals, before accepting the representation of a new client, or the representation of an existing client in a new matter, to perform a conflicts check through PSZJ’s database and to enter into that database conflict information regarding new clients or new matters. Thus, a review of said computerized database should reveal any and all actual or potential conflicts of interest with respect to any given representation.

3. PSZJ has run the following additional parties and counsel through its conflicts database: Bradley J. Busbin; Nuti Hart LLP; Greg Nuti; Kevin Coleman; Jamie Dreher; Mark Wray; Brutzkus Gubner; Steve Gubner; Jerrold Bregman; and Northern Trust. Also, PSZJ has run the names of the debtors in the related bankruptcy cases of Desert Land, Desert Investment, and SkyVue, as well as the creditors listed on Schedules D, E and F in those cases (which were not the subject of a prior search and are only listed once here despite sometimes being present on more than one debtor’s schedules): Citation Financial LLC, Citation Hangar, LLC, Compass Investments Holdings LLC, Compass Investments, LLC, Clark County Treasurer, Clark County Treasurer SID #114B, Curtis Ensign, Evolve Reporting Group, LLC, Hutchison & Steffen, Juniper Loan Servicing, Las Vegas Valley Water District, Marquis Auerbach Coffing, Morrison Security Group, Morse-Kruger & Associates, LLC, Nevada Court Reporting, NV Energy, Republic Services, Shotgun Creek Investments, LLC, Shotgun Creek Las Vegas, LLC, Shotgun Investments Nevada, LLC, David Stoebling, The Ranch LLC, Tivoli Motel Inc., Wadsworth Wagner LLC, and Valley Lawn Care.

4. Based on the foregoing supplemental conflicts searches and to the best of my knowledge, PSZJ does not have any connections with the foregoing parties, creditors and counsel representatives that would impinge on the “disinterestedness” of PSZJ.

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